

1 RUSSELL E. MARSH, ESQUIRE
Nevada Bar No. 11198
2 WRIGHT MARSH & LEVY
300 S. Fourth Street
3 Suite 701
Las Vegas, NV 89101
4 Phone: (702) 382-4004
Fax: (702) 382-4800
5 russ@wmlawlv.com
Attorneys for Defendant Thornburg
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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,)
11 Plaintiff,)
12)
13 vs.)
14 ROBERT THORNBURG,)
15 Defendant.)

CASE NO. 2:18-CR-00208-RFB-DJA

16
17 **STIPULATION TO CONTINUE SENTENCING HEARING**
(Second Request)

18 IT IS HEREBY STIPULATED AND AGREED, between the United States of America, by
19 and through its attorney, Nicholas A. Trutanich, United States Attorney, through Christopher D.
20 Baker, First Assistant United States Attorney; and Defendant Robert Thornburg, by and through his
21 counsel, Russell E. Marsh, Esquire, Wright Marsh & Levy, that the sentencing hearing currently
22 scheduled for March 5, 2020, at 11:00 a.m. be vacated and set to a date and time convenient to this
23 Court, but no sooner than fourteen (14) days from the current sentencing date.

24 This stipulation is entered into for the following reasons:

25 1. On October 31, 2019, Mr. Thornburg pleaded guilty to a Superseding Criminal
26 Information. (ECF No. 143.)

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1 2. The parties need additional time to prepare for Defendant Thornburg's sentencing
2 hearing. Defense counsel also requires additional time to meet with Mr. Thornburg, review
3 documents, and prepare a sentencing memorandum. Defense counsel also requires time to review
4 and organize voluminous materials provided by Thornburg.

5 3. The parties agree to the continuance. Mr. Thornburg is currently in custody and
6 agrees to the continuance.

7 4. Additionally, denial of this request for continuance could result in a miscarriage of
8 justice.

9 5. The additional time requested by this Stipulation is made in good faith and not for
10 purposes of delay.

11 6. This is the second request for a continuance of the sentencing hearing.

12 Dated this 24th day of February, 2020.

13 Respectfully submitted:

14 WRIGHT MARSH & LEVY

NICHOLAS A. TRUTANICH
UNITED STATES ATTORNEY

16 BY /s/ Russell E. Marsh
17 RUSSELL E. MARSH, ESQUIRE
Attorney for Defendant Thornburg

BY /s/ Christopher D. Baker
CHRISTOPHER D. BAKER
First Assistant U.S. Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,)
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ORDER

9 Based on the Stipulation of the parties, the sentencing hearing in this matter is hereby
10 continued. The ends of justice served by granting said continuance outweigh the best interest of the
11 public and the defendant in a speedy sentencing, since the failure to grant said continuance would
12 be likely to result in a miscarriage of justice, and would deny the parties herein sufficient time and
13 the opportunity within which to be able to effectively and thoroughly prepare for sentencing, taking
14 into account the exercise of due diligence.

15 IS IT HEREBY ORDERED that the sentencing in the above-captioned matter currently
16 scheduled for March 5, 2020, at 11:00 a.m., be vacated and continued to March 19, 2020 at 11:30 AM

17 DATED: February 25, 2020

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20 RICHARD F. BOULWARE, II
United States District Judge
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